

1 KELLER BENVENUTTI KIM LLP
2 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
3 Jane Kim (#298192)
(jkim@kbkllp.com)
4 David A. Taylor (#247433)
(dtaylor@kbkllp.com)
5 650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
6 Fax: 650 636 9251

ROVENS LAMB LLP
Steven A. Lamb (#132534)
(slamb@rovenslamb.com)
1500 Rosecrans Avenue, Suite 418
Manhattan Beach, CA 90266
Tel: 310 536 7830

7 *Attorneys for Debtors and Reorganized Debtors*

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric Company
20 Affects both Debtors

21 ** All papers shall be filed in the Lead Case, No.
22 19-30088 (DM).*

23 Bankruptcy Case No. 19-30088 (DM)

24 Chapter 11

25 (Lead Case) (Jointly Administered)

26 **DECLARATION OF STEVEN A. LAMB IN**
27 **SUPPORT OF REORGANIZED DEBTORS'**
28 **OBJECTION TO PROOF OF CLAIM NO.**
29 **2090 FILED BY AMIR SHAHMIRZA**

30 **Response Deadline:**
31 **April 26, 2022, 4:00 p.m. (Pacific Time)**

32 **Hearing Information If Timely Response Made:**
33 Date: May 10, 2022
34 Time: 10:00 a.m. (Pacific Time)
35 Place: (Tele/Videoconference Appearances Only)
36 United States Bankruptcy Court
37 Courtroom 17, 16th Floor
38 San Francisco, CA 94102

1 I, Steven A. Lamb, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am an attorney with the law firm of Rovens Lamb LLP and am one of the attorneys
5 representing PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
6 “**Utility**”), as debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**,” or as
7 reorganized pursuant to the Plan¹, the “**Reorganized Debtors**”) and am counsel of record on behalf of
8 PG&E Corp. in the action entitled, *Amir Shahmirza and Komir, Inc. v. PG&E Corporation*, San Mateo
9 Superior Court Case 18CIV06064, filed November 9, 2018 (the “**State Court Action**”). I submit this
10 Declaration in support of the *Reorganized Debtors’ Objection to Proof of Claim No. 2090 filed by Amir*
11 *Shahmirza* (“**Objection**”), filed contemporaneously herewith.

12 2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint.
13 3. Attached hereto as **Exhibit B** is a true and correct copy of the Notice.
14 4. Attached hereto as **Exhibit C** is a true and correct copy of the Proof of Claim.
15 5. Attached hereto as **Exhibit D** is a true and correct copy of the Information Request
16 Response.

17 6. Attached as **Exhibit E** is a true and correct certified copy of Ordinance 3975, issued by
18 the City and County of San Francisco Office of the Clerk, Board of Supervisors.

19
20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
21 correct to the best of my knowledge, information, and belief. Executed this 8th day of April, 2022.

22 _____
23 /s/ *Steven A. Lamb*
24 Steven A. Lamb
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¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Objection.